

## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Judge: Yvette Kane

Case: Victor R. Cotton v. Three Rivers Health Plans, Inc.  
No 1:CV-00-1709

## PLAINTIFF'S EXHIBIT LIST

No. <sup>1</sup>	Description of Item	Identified	Evidence	Ruling	Witness
P1	Plaintiff's Complaint				
P2	Deposition transcript and videotape of Victor Cotton				
P3	Deposition transcript and videotape of William Lawson				
P4	Deposition transcript and videotape of Thomas Carmichael				
P5	Deposition transcript and videotape of Scott Markovich				MAR - 5 2002 MARY E. ANDREA, CLERK Per _____ DEPUTY CLERK
P6	Deposition transcript and videotape of Lewis Perry				
P7	Deposition transcript and videotape of Charles Artz				
P8	Deposition transcript and videotape of David Thomas				
P9	Deposition transcript and videotape of Beverly Ludlum				
P10	Three Rivers Health Plans, Inc. Job Description	(3/4/02	3/6/02	Adm	Dr. Victor Cotton

<sup>1</sup> Plaintiff reserves the right to use any exhibit included on Defendant's exhibit list and to supplement this exhibit list after the Court resolves the pending motion for summary judgment.

P11	Three Rivers Health Plans, Inc.'s Acknowledgement and Disclosure dated April 29, 1999			
P12	Three Rivers Health Plans, Inc. Pay Rate Review and History Form	3/4/02	3/5/02 Adm	DR. Victor Cotton
P13	Documents produced by Defendant in response to Plaintiff's Request for Production of Documents: (See Attached Index)	/6	3/4/02	DR. Victor Cotton
P14	Memorandum dated 9/14/98 from Bill Lawson to Victor Cotton	3/4/02	3/5/02 Adm	DR. Victor Cotton
P15	Memorandum dated 9/29/98 from Bill Lawson to Victor Cotton	3/4/02	3/5/02 Adm	DR. Victor Cotton
P16	Memorandum dated 12/1/98 from Warren Carmichael to Victor Cotton	3/4/02	3/5/02 Adm	DR. Victor Cotton
P17	Stock Option Agreement dated February 1, 1999 and effective on May 4, 1999	3/4/02	3/5/02 Adm	DR. Victor Cotton
P18	Memorandum dated 8/26/98 from Warren Carmichael to Danette Mandella			

P19	Team Member Bonus Plan Evaluations	3/4/02	3/6/02	Adm	Dr. Victor Cotton
P20	Quarterly Bonus Plan Team Member Evaluations	3/4/02	3/6/02	Adm	Dr. Victor Cotton
P21	Dr. Cotton's Affidavit dated 10/29/01				
P22	Memorandum dated 1/20/98 from Warren Carmichael to Beverly Ludlum which is attached to Defendant's Statement of Undisputed Facts as Exhibit "I"		3/4/02		Dr. Victor Cotton
P23	Memorandum dated 5/18/99 from Beverly Ludlum to Warren Carmichael which is attached to Defendant's Statement of Undisputed Facts as Exhibit "J"				
P24	Memorandum dated 5/6/99 from Warren Carmichael to File re: Pat Casey Meeting				Dr. Victor Cotton
P25	Memorandum dated 2/19/99 which is attached to Defendant's Statement of Undisputed Facts as Exhibit "K"		3/4/02		

P26	Investigative Memorandum dated 7/30/98 from Jerry Hogenmiller re: meeting with Donna Lengel	3/4/02	Dr. Victor Cotton
P27	Investigative Memorandum dated 7/30/98 from Jerry Hogenmiller re: meeting with Terry Quinn	3/4/02	Dr. Victor Cotton
P28	Investigative Memorandum dated 7/30/98 from Jerry Hogenmiller re: meeting Deb Ceruti	3/4/02	Dr. Victor Cotton
P29	Investigative Memorandum dated 7/31/98 from Jerry Hogenmiller re: meeting with Kelly Lennon	3/4/02	Dr. Victor Cotton
P30	Medical Cost Containment Incentive Plan for Victor Cotton for period 3/1/98 – 9/30/99		
P31	UM Organization Chart	3/24/02	Adm
P32	UM Operating Plan dated 5/11/99	3/6/02	Adm
P33	Certificates, Recognitions, Awards, Achievements and goodbye notes		

P34	Personnel file for Danette Mandella (not yet supplied by Defendant) <sup>2</sup>				
P35	Personnel file for Pat Casey (not yet supplied by Defendant) <sup>2</sup>				
P36	Personnel file for Peggy Wetzel (not yet supplied by Defendant) <sup>2</sup>				
P37	Personnel file for Jill Guffey (not yet supplied by Defendant) <sup>2</sup>				
P38	All Three Rivers' files which relate to Dr. Cotton (in the depositions, various employees discussed files regarding Dr. Cotton) (not yet supplied by Defendant) <sup>2</sup>				
P39	Hospital contracts and all communication with regard to these contracts, renegotiations and issues or problems arising out of the relationship between these hospitals and Three Rivers (not yet supplied by Defendant) <sup>2</sup>				

<sup>2</sup> These items were originally requested in Plaintiff's Request for Production of Documents. Defendant objected on the basis of "relevancy". Follow up letters were sent on 8/7/01 and 10/17/01 requesting these items again. Plaintiff has not received a response to these letters.

P40	Provider contracts (not yet supplied by Defendant) <sup>2</sup>						
P41	Files with regard to the investigation conducted by Mr. Hogenmiller (not yet supplied by Defendant) <sup>2</sup>						
P42	DPW records (in the Case management Order, Three Rivers agree to produce these documents) (not yet supplied by Defendant) <sup>2</sup>						
P43	All documents criticizing Dr. Cotton and his performance as a Medical Director for Three Rivers (not yet supplied by Defendant) <sup>2</sup>						
P44	All job descriptions for Dr. Cotton's role as Medical Director, whether such description was produced internally by Three Rivers or by an outside entity (e.g. DPW). (not yet supplied by Defendant) <sup>2</sup>						
P45	Timeline of significant events during Plaintiff's employment	3/4/02	3/6/02	Dr.	Victor Cotton		
P46	State filings						
P47	DPW regulations						